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October 1, 2024

Hon. Katherine Polk Failla
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Jaime Lan*
Case No.: 24 Cr. 425

Dear Judge Failla,

I was assigned, pursuant to the Criminal Justice Act, to represent Jaime Lan in the above referenced matter. Mr. Lan is currently scheduled to be sentenced on October 17. However, we only received the final Pre-Sentence disclosure from Probation today. In order to allow sufficient time to review the final Pre-Sentence Report and address any related issues or concerns with my client, I respectfully request an adjournment of the sentencing hearing to mid-November or thereafter. Further, I ask that the deadline for submission of our sentencing memorandum be early November, or two weeks prior to the proposed timeline, with the Government's submission due one week prior to the proposed timeline.

The Government has no objection to this request.

Finally, if this request is amenable to the Court, I respectfully ask that the sentencing hearing be re-scheduled to a Monday, Tuesday, or Thursday in mid-November as I have standing teaching engagements on Wednesdays and Fridays.

I thank the Court for its consideration.

Respectfully submitted,

Louis V. Fasulo
Louis V. Fasulo, Esq.

Cc: Meredith Foster, AUSA

Application GRANTED. The sentencing currently scheduled for October 17, 2024, is hereby ADJOURNED to **November 12, 2024**, at **3:00 p.m.**

The Defense shall file its sentencing submission on or before **October 29, 2024**. The Government shall file its sentencing submission one week thereafter, on or before **November 5, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 28.

Dated: October 2, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE